

shall be construed as an admission or concession of liability by any of the defendants or the City of New York regarding any of the allegations made by the plaintiffs in their complaints, or that any of the plaintiffs' rights under the Federal or New York Constitutions or Statutes had been violated.

A review of the officer's Central Personnel Index (CPI) revealed the following:

1. On November 19, 2009 Officer Tabora had a substantiated departmental investigation for computer misuse stemming from utilizing another MOS's computer code for which he received a schedule "B" command discipline and forfeited two (2) vacation days.
2. On September 14, 2011 Officer Tabora had a substantiated departmental investigation for failure to bring his memo book in traffic court for which he received a schedule "B" command discipline.
3. On November 8, 2013 Officer Tabora had a substantiated departmental investigation for violation of departmental rules for which he received a schedule "A" command discipline.
4. On August 24, 2017 Officer Tabora had a substantiated departmental investigation for wrongfully sending text messages and posting social media profane, derogatory and inappropriate material for which he forfeited 15 vacation days.

A review of the officer's CCRB history revealed the following:

1. On November 16, 2014, a CCRB investigation found that he improperly questioned someone and that he failed to make proper notations in his memo book, for which an "A" command discipline was issued.

The People reserve the right to move *in limine* to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.

Should you wish to discuss this matter, please do not hesitate to call me at [REDACTED] [REDACTED] Ext.] during office hours.

Sincerely,

[REDACTED]
[REDACTED]

cc: Clerk of the Court